

IN THE CIRCUIT COURT OF THE 15TH  
JUDICIAL CIRCUIT IN AND FOR PALM  
BEACH COUNTY, FLORIDA

CIVIL DIVISION

50 2008 CA 0280 58 XXXXMB AD  
CASE NO.: \_\_\_\_\_

E.W.,

Plaintiff,

vs.

① JEFFREY EPSTEIN,

Defendant.

COMPLAINT

Plaintiff, E.W., by and through her undersigned counsel, sues the Defendant, Jeffrey Epstein, and alleges:

1. This is an action in an amount in excess of \$15,000.00, exclusive of interest and costs and is within the jurisdictional limits of this Court.
2. This Complaint is brought under a fictitious name in order to protect the identity of the Plaintiff because this Complaint makes allegations of sexual assault and child abuse of a then minor.
3. At all times material to this cause of action, the Plaintiff, E.W. (hereinafter referred to as "Plaintiff"), was a resident of Palm Beach County, Florida.
4. At all times material to this cause of action, the Defendant, Jeffrey Epstein, had a residence located at 358 El Brillo Way, West Palm Beach, Palm Beach County, Florida.

5. Defendant, Jeffrey Epstein, is currently a citizen of the State of Florida, as he currently resides in West Palm Beach, Florida at the Palm Beach County Jail and has the intention to remain in Florida. This is substantiated by the residence that he maintains at 358 El Brillo Way, West Palm Beach, Florida where he spends the majority of his time, and intentions to remain at that address permanently are further evidenced by his statements to the Court during his State Plea colloquy on June 30, 2008, case number 06CF009454AMB, taken before the Honorable Judge Dale Pucillo, wherein he indicated that after his release from the Palm Beach County Jail he intends to reside permanently at his home at 358 El Brillo Way, West Palm Beach, Florida, and he plans to work in West Palm Beach, Florida as well.

6. At all times material to this cause of action, the Defendant, Jeffrey Epstein, was an adult male born in 1953.

7. At all times material, the Defendant, Jeffrey Epstein, owed a duty unto Plaintiff to treat her in a non-negligent manner and to not commit intentional or tortious or illegal acts against her.

8. All of the allegations within this Complaint occurred in West Palm Beach, Florida.

#### **FACTUAL ALLEGATIONS**

9. Upon information and belief, the Defendant, Jeffrey Epstein, has demonstrated a sexual preference and obsession for minor girls.

10. The Defendant, Jeffrey Epstein, developed a plan, scheme, and criminal enterprise that included an elaborate system wherein the then minor Plaintiff was brought to the Defendant,

Jeffrey Epstein's residence by the Defendant's employees, recruiters, and assistants. When the assistants and employees left the then minor Plaintiff and other minor girls alone in a room at the Defendant's mansion, the Defendant, Jeffrey Epstein, himself would appear, remove his clothing, and direct the then minor Plaintiff to remove her clothing. He would then perform one or more lewd, lascivious, and sexual acts, including, but not limited to, masturbation, touching of the then minor Plaintiff's sexual organs, coercing or forcing the then minor Plaintiff to perform oral sex on him, using vibrators or sexual toys on the then minor Plaintiff, coercing the then minor Plaintiff into sexual acts with himself or others, and digitally penetrating the then minor Plaintiff. He would then pay the Plaintiff for engaging in this sexual activity.

11. The Plaintiff was first brought to the Defendant, Jeffrey Epstein's mansion in 2002 when she was a fourteen-year old in middle school.

12. The then minor Plaintiff was a vulnerable child without adequate parental support at all times material to this Complaint. The Defendant, Jeffrey Epstein, a wealthy financier with a lavish home, significant wealth, and a network of assistants and employees, used his resources and his influence over a vulnerable minor child to engage in a systematic pattern of sexually exploitive behavior.

13. Beginning in approximately August 2002 and continuing until approximately September 2005, the Defendant, Jeffrey Epstein, coerced, induced and/or enticed the impressionable, vulnerable, and economically deprived then minor Plaintiff to commit various acts of sexual misconduct. These acts included, but were not limited to, fondling and inappropriate and illegal sexual touching of the then minor Plaintiff, forcing the then minor Plaintiff into oral sex, sexual misconduct and masturbation of the Defendant, Jeffrey Epstein, in

the presence of the then minor Plaintiff, handling and fondling of the then minor Plaintiff's sexual organs for the purpose of masturbation, and encouraging the then minor Plaintiff to become involved in prostitution; Defendant, Jeffrey Epstein, committed numerous criminal sexual offenses against the then minor Plaintiff including, but not limited to, sexual battery, solicitation of prostitution, coercing a minor into a life of prostitution, and lewd and lascivious assaults upon the person of the then minor Plaintiff.

14. In addition to the direct sexual abuse and molestation of the then minor Plaintiff, Defendant, Jeffrey Epstein, instructed, coerced and otherwise induced the then minor Plaintiff to bring him numerous other minor children for the purposes of further satisfying his deviant sexual attraction to minors. Defendant, Jeffrey Epstein, used his money, wealth and power to unduly and improperly manipulate and influence the then minor Plaintiff to bring him these other minor girls in exchange for money. This influence led the then minor Plaintiff away from the life of a middle school aged child and into a delinquent lifestyle.

15. The acts referenced above in paragraphs 10 through 14, committed by Defendant, Jeffrey Epstein, against the then minor Plaintiff were committed in violation of numerous criminal State statutes condemning the sexual exploitation of minor children, prostitution, sexual performances by a child, lewd and lascivious assaults, sexual battery, contributing to the delinquency of a minor and other crimes, specifically including, but not limited to, those criminal offenses outlined in Chapters 794, 800, 827 and 847 of the Florida Statutes, as well as those designated in Florida Statutes §796.03, §796.07, §796.045, §796.04, §796.09, §39.01, and §827.04.

16. The above-described acts took place in Palm Beach County, Florida at the residence of the Defendant, Jeffrey Epstein. Any assertions by the Defendant, Jeffrey Epstein, that he was unaware of the age of the then minor Plaintiff are belied by his actions and rendered irrelevant by the provisions of applicable Florida Statutes concerning the sexual exploitation and abuse of a minor child. The Defendant, Jeffrey Epstein, at all times material to this cause of action, knew and should have known of the Plaintiff's minority.

17. The above-described acts were perpetrated upon the person of the then minor Plaintiff on numerous occasions.

18. In June 2008, in the Fifteenth Judicial Circuit in Palm Beach County, Florida, the Defendant, Jeffrey Epstein, entered pleas of "guilty" to various Florida state crimes involving the solicitation of minors for prostitution and the procurement of minors for the purposes of prostitution.

19. As a condition of that plea, and in exchange for the Federal Government not prosecuting the Defendant, Jeffrey Epstein, for numerous federal offenses, Defendant, Jeffrey Epstein, additionally entered into an agreement with the Federal Government acknowledging that E.W. was a victim of his conduct.

20. The Plaintiff is included in the list of victims identified by the Federal Government as victims of the Defendant, Jeffrey Epstein's illegal conduct. The Defendant, Jeffrey Epstein, is thus estopped by his plea and agreement with the Federal Government from denying the acts alleged in this Complaint, and must effectively admit liability to the Plaintiff.

## **COUNT I**

### **Sexual Exploitation, Sexual Abuse and/or Sexual Assault of a Minor**

21. The Plaintiff repeats and realleges paragraphs 1 through 20 above.

22. Defendant, Jeffrey Epstein, tortiously assaulted Plaintiff sexually on numerous occasions between approximately August 2002 and approximately September 2005, and further sexually exploited her and contributed to her delinquency during that time. Defendant's acts were outrageous, egregious, intentional, unlawful, offensive and harmful.

23. The sexual assaults were in violation of the numerous state statutes described in paragraph 15 above, and the assaults and acts of exploitation were committed by Defendant, Jeffrey Epstein, willfully and maliciously.

24. As a direct and proximate result of Defendant, Jeffrey Epstein's assaults on the Plaintiff, the Plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the Plaintiff, E.W., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, attorney's fees, and such other and further relief as this

Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

## **COUNT II**

### **Cause of Action Pursuant to Florida Statute 796.09**

25. The Plaintiff adopts and realleges paragraphs 1 through 20 above.
26. The allegations contained herein in Count II are a separate and distinct legal remedy.
27. Defendant, Jeffrey Epstein, was a wealthy and powerful man, and Plaintiff was an economically disadvantaged and impressionable minor.
28. Defendant, Jeffrey Epstein, used his vast wealth and power to coerce Plaintiff into prostitution and/or coerced her to remain in prostitution.
29. Defendant, Jeffrey Epstein, coerced Plaintiff into prostitution in one or more of the following ways:
  - A. Domination of her mind and body through exploitive techniques;
  - B. Inducement;
  - C. Promise of greater financial rewards;
  - D. Exploitation of a condition of developmental disability, cognitive limitation, affective disorder, and/or substance dependency;
  - E. Exploitation of human needs for food, shelter or affection;
  - F. Exploitation of underprivileged and vulnerable economic condition or situation;

G. Use of a system of recruiting other similarly situated minor girls to further coerce and induce Plaintiff into the lifestyle of prostitution; and

H. Exploitation through demonstration of abundant wealth and power to impress a young and vulnerable then minor Plaintiff and to coerce her into prostitution.

30. As a direct and proximate result of the offenses committed by Defendant, Jeffrey Epstein, against Plaintiff pursuant to Florida Statutes §769.09, the Plaintiff has in the past suffered, and will in the future suffer, physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the Plaintiff, E.W., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, attorney's fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.



### **COUNT III**

#### **Intentional Infliction of Emotional Distress**

31. The Plaintiff adopts and realleges paragraphs 1 through 20 above.

32. The Defendant, Jeffrey Epstein's conduct towards the then minor Plaintiff was intentional and reckless.

33. The Defendant, Jeffrey Epstein, deliberately and recklessly inflicted mental suffering upon the then minor Plaintiff.

34. The Defendant, Jeffrey Epstein's conduct was outrageous in character, and so extreme in degree, going beyond all bounds of decency.

35. The Defendant, Jeffrey Epstein's intentional, deliberate and reckless conduct caused severe emotional distress to the Plaintiff. Defendant, at the time he committed these numerous sexual assaults on Plaintiff, had a specific intent to harm the then minor Plaintiff and his conduct did so harm the Plaintiff.

36. As a direct and proximate result of the Defendant, Jeffrey Epstein's intentional and reckless conduct, the Plaintiff has in the past suffered and in the future will continue to suffer physical injury, pain and suffering, emotional distress, psychological trauma, mental anguish, humiliation, embarrassment, loss of self-esteem, loss of dignity, invasion of her privacy and other damages associated with the Defendant, Jeffrey Epstein, controlling, manipulating and coercing her into a perverse and unconventional way of life for a minor. The then minor Plaintiff incurred medical and psychological expenses and the Plaintiff will in the future suffer additional medical and psychological expenses. The Plaintiff has suffered a loss of income, a loss of the capacity to

earn income in the future, and a loss of the capacity to enjoy life. These injuries are permanent in nature and the Plaintiff will continue to suffer these losses in the future.

WHEREFORE, the Plaintiff, E.W., demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, attorney's fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

#### **COUNT IV**

##### **Civil Remedy for Criminal Practices**

37. The Plaintiff realleges paragraphs 1 through 20 above.
38. The allegations contained herein in Count IV are a separate and distinct legal remedy.
39. The Defendant, Jeffrey Epstein, participated in an enterprise, or conspired or endeavored to so participate, through a pattern of criminal activity in violation of Florida Statutes §772.103(3)-(4).
40. The Defendant, Jeffrey Epstein, participated in this pattern of criminal activity by engaging in at least two of the following acts of criminal misconduct with the same or similar intents, results, accomplices, victims, and methods of commission within a five year period:
  - A. Procuring for prostitution, or causing to be prostituted, any person who is under the age of 18 years in violation of Florida Statutes Chapter 796;
  - B. Forcing, compelling, or coercing another to become a prostitute in violation of Florida Statutes §796.04;
  - C. Acts of battery in violation of Florida Statutes Chapter 784;

D. Act of lewdness in violation of Florida Statutes Chapter 800;

E. Sexual performance or exploitation of a child in violation of Florida Statutes §827.071; and

F. Other crimes involving contributing to the delinquency of a child, sexual abuse of a child, and coercing a child into prostitution.

41. Under the Defendant, Jeffrey Epstein's plan, scheme, and enterprise, the Defendant, Jeffrey Epstein, paid employees and underlings to repeatedly find and bring him minor girls in order for the Defendant to solicit, induce, coerce, entice, compel or force such girls to engage in acts of prostitution and sexual misconduct.

42. The Plaintiff was the victim of the Defendant, Jeffrey Epstein's plan, scheme, and enterprise. The Plaintiff was called on the telephone and transported by various individuals to the Defendant, Jeffrey Epstein's residence, where she was placed in a room along with the Defendant, enticed to commit acts of prostitution, battery, and sexual exploitation. The Defendant, Jeffrey Epstein, conspired with his assistants and employees and various adults and minor children in order to accomplish his enterprise of seeking out, gaining access to, and exploiting minor children such as the Plaintiff.

43. After introducing Plaintiff into prostitution, he enticed her to remain in prostitution and be a part of his deviant sexual lifestyle through exploitive techniques, such as offering additional money to Plaintiff in exchange for her bringing him additional minor girls to sexually abuse and commit sexual crimes against.

WHEREFORE, under the provisions of Florida Statutes Chapter 772, the Plaintiff demands judgment against the Defendant, Jeffrey Epstein, for compensatory damages, treble

damages, costs and attorneys' fees, and such other and further relief as this Court deems just and proper, and hereby demands trial by jury on all issues triable as of right by a jury.

DATED this 10th day of September, 2008.

THE LAW OFFICE OF BRAD EDWARDS &  
ASSOCIATES, LLC  
Attorneys for Plaintiff  
2028 Harrison Street  
Suite 202  
Hollywood, Florida 33020  
Telephone: 954-414-8033  
Facsimile: 954-924-1530

Jay Howell, Esquire  
Florida Bar #225657  
JAY HOWELL & ASSOCIATES, P.A.  
Co-Counsel for Plaintiff  
644 Cesery Boulevard  
Suite 250  
Jacksonville, Florida 32211  
Telephone: 904-680-1234  
Facsimile: 904-680-1238

By: 

Brad Edwards  
Florida Bar #542075